

EPA Region 5 Records Ctr.



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Nos. 3 + 9
Persons Knowledgable

198615881

AFFIDAVIT OF HAROLD FALKOWSKI

STATE OF WISCONSIN)
) ss.
COUNTY OF ONEIDA)

non-responsive, being first duly sworn on oath, deposes and states as follows:

1. I am presently seventy-six (76) years old and reside with my wife at **non-responsive**, City of Rhinelander, Oneida County, Wisconsin.

2. I am currently retired, but I was previously employed in various positions with Milwaukee Solvay Coke Company ("Milwaukee Solvay") for more than thirty-four (34) years during the period 1945-1982. My employment with Milwaukee Solvay was continuous during that period except for one interruption of approximately 1 1/2 to 2 years when I was employed elsewhere.

3. The Milwaukee Solvay office and plant were located at 311 East Greenfield Avenue in the City of Milwaukee, Wisconsin. All of my job positions with the Company were at this plant, and I am not aware of any other plants or buildings owned by Milwaukee Solvay during my term of employment with the Company.

4. My first position with Milwaukee Solvay was as a laborer, but I moved quickly into the coal handling and pulverizing department as a worker. Again I moved after less than a year into the electrical department where I became a electrician and then the chief electrician. I remained in this role into the mid-1960's, when I became the chief of the entire maintenance department, a position I held until the late 1970's. I was then promoted to

superintendent of operations until I retired in 1982. The plant closed in 1983.

5. My positions as chief electrician and chief of maintenance involved inspection and work in every physical area of the plant over time. As a result, I became familiar with virtually all of the physical facilities in the plant. As superintendent of operations, I continued to be knowledgeable regarding the physical facilities in the plant, and also became more familiar with the production processes of the plant.

6. The primary production process at the Milwaukee Solvay plant was to produce coke from coal. Coke is a purified form of coal which results from heating the coal at very high temperatures inside ovens which are sealed to prevent air from coming into contact with the coal.

7. A second main product produced by heating the coal in ovens was coke oven gas, which could be used as a fuel. Prior to the introduction of natural gas into Milwaukee in the 1950's, some of the gas produced at Milwaukee Solvay was sold to users in the City of Milwaukee. After natural gas replaced this business, Milwaukee Solvay continued to sell coke oven gas to the Milwaukee Metropolitan Sewerage District for a few more years.

8. The coke oven gas produced by the Company was also used as fuel by Milwaukee Solvay itself to heat the coke ovens and at some times, the boiler in the power plant. At certain times, there was not enough coke oven gas available for all of the needs inside the plant, and the Company would purchase natural gas from

other suppliers. The Company tried to keep these purchases to a minimum, and would also mix other byproducts with the coke oven gas to be burned as fuel inside the plant.

9. The coke oven gas produced at Milwaukee Solvay was a purified form of gas left after some components like coal tar were separated out as the gas cooled after coming off from the ovens. To the best of my knowledge, the coke oven gas was never purified further by filtering through oxide boxes, and I do not recall ever seeing oxide box filters on the premises at Milwaukee Solvay at any time during my employment there from 1945 to 1982.

10. Milwaukee Solvay tried to treat all materials produced from coal as byproducts rather than wastes. Whenever possible, the Company resold the byproducts commercially. Alternatively, the byproducts were reintroduced with the coke oven gas and burned as fuel.

11. I cannot recall any wastes being disposed of by Milwaukee solvay at sites away from the plant except paper and other office garbage, which was periodically hauled away in dumpsters. I am not aware of any oxide box wastes ever being produced at this plant, and am also unaware of any wastes of any kind being trucked from the Milwaukee Solvay plant to locations within the City of West Allis for disposal.

FURTHER AFFIANT SAYETH NOT.

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Subscribed and sworn to before me
this 21 day of February, 1997.

Debra J. Umland
Notary Public, State of Wisconsin
My Commission: July 7, 1997

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AFFIDAVIT OF RICHARD S. SCHLIDT

STATE OF WISCONSIN)
) ss.
COUNTY OF MILWAUKEE)

non- [REDACTED], being first duly sworn on oath,
deposes and states as follows:

1. I am presently fifty-one (51) years old and reside with my wife in Colgate, Wisconsin.

2. I currently own and am employed by Transit Design, Inc., a Wisconsin corporation engaged in the business of design and management. Transit Design, Inc. has contracted with Admiral Tool & Manufacturing Company, an Illinois corporation, to manage Admiral's Transit Seating Division, which has its offices and plant located at 2737 South 31st Street, Milwaukee, Wisconsin 53215.

3. I hold a BA degree in business administration-industrial operations from the University of Wisconsin-Milwaukee, which was conferred on me in 1973. I had attended college part-time while working during the preceding nine (9) years, and my course work included classes entitling me to junior status in chemical engineering in addition to my major in business administration.

4. During the periods 1965 to 1972 and 1978 to 1983, I was employed by Milwaukee Solvay Coke Company ("Milwaukee Solvay"), a division of Pickands Mather and Company. The offices and primary manufacturing plant of Milwaukee Solvay were located at 311 East Greenfield Avenue, Milwaukee, Wisconsin. I was employed at this location in all of my various positions and titles with the

company.

5. My terms of employment and position titles with Milwaukee Solvay were as follows:

<u>Term</u>	<u>Title</u>
1/65 - 3/67	Draftsman and Engineering Aide
3/67 - 2/69	Chief Chemist
2/69 - 11/72	Assistant Superintendent of Operations
12/72 - 4/78	Employed Elsewhere
4/78 - 12/80	Special Assistant to Vice President for Compliance with Health and Environmental Standards
12/80-4/83	General Manager

6. In my varied positions with Milwaukee Solvay, I became familiar with virtually all aspects of the manufacturing operations which occurred at Milwaukee Solvay during the time periods of my employment there. In particular, my duties as General Manager from 12/80 to 4/83 and as Assistant Superintendent of Operations from 2/69 to 11/72 required supervision of the full spectrum of production operations, including production planning, scheduling of personnel and equipment, quality control, maintenance, changes in production methods, and storage and disposition of products and by-products. In my role as special assistant to the vice president during the period 4/78 - 12/80, I was directly responsible for developing and supervising changes in equipment and procedures at the plant to comply with air pollution and health and safety laws. In carrying out these responsibilities, I traveled to other coke plants across the United States and become familiar with waste control practices in the

coke oven gas produced at Milwaukee Solvay during my employment with the company was not filtered through oxide box chips as was the gas produced by utility suppliers using raw coal in manufactured gas plants. To the best of my knowledge, this was always the case with coke oven gas produced at Milwaukee Solvay. Therefore, Milwaukee Solvay did not produce any oxide box wastes for disposal.

11. To the best of my knowledge, when producer gas was manufactured by Milwaukee Solvay specifically for commercial sale, it was produced from coke rather than raw coal. Because coke is greatly purified from raw coal, there was no further purification of the gas through oxide box chips. I am not aware of any production process at any time at Milwaukee Solvay which produced oxide box wastes.

12. In general, the practices of Milwaukee Solvay were to treat all materials as byproducts rather than as wastes. Milwaukee Solvay either reclaimed the byproducts and sold them commercially or reintroduced them with the coke oven gas and burned the mixture in lieu of purchased fuel for heating the coke ovens. These practices resulted in very little if any production wastes which required disposal by the company. In particular, I am not aware of any wastes of any type which were disposed of by Milwaukee Solvay on lands located within the City of West Allis.

Further affiant sayeth not.

Dated at Milwaukee, Wisconsin this 7 day of ~~February~~ ^{MARCH} 1997.

1997.

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non-responsive

Subscribed and sworn to before me
this 7th day of March, 1997.

Dymna A. Johnson
Notary Public, State of Wisconsin
My Commission: 8-27-05

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